UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO

SARA HAWES, in	ndividually,	and on	behalf of
all others similarly	situated,		

Case No. 1:17-cv-00754

Judge Timothy S. Black

Plaintiff,

v.

MACY'S WEST STORES, INC.,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Macy's West Stores, Inc., through undersigned counsel, respectfully moves for entry of summary judgment in favor of Defendant, and against Plaintiff Sara Hawes, with respect to each of Hawes' claims. Pursuant to LR 7.2(a), the grounds for this Motion and authorities relied upon in support thereof are set forth in an accompanying Memorandum.

WHEREFORE, Defendant respectfully requests that the Court enter judgment in its favor with respect to each of Plaintiff's claims and dismiss those claims with prejudice.

This the 30th day of July, 2021.

/s/ Beth A. Bryan

Beth A. Bryan (Ohio Reg. 0082076) TAFT STETTINIUS & HOLLISTER LLP 425 Walnut Street, Suite 1800 Cincinnati, Ohio 45202 Phone: (513) 381-2838

Fax: (513) 381-0205 bryan@taftlaw.com

Jennifer K. Van Zant (pro hac vice) NC State Bar No. 21280 Andrew L. Rodenbough (pro hac vice) NC State Bar No. 46364 Ryan C. Fairchild (pro hac vice) N.C. State Bar No. 47729 BROOKS, PIERCE, McLENDON, HUMPHREY & LEONARD, LLP 230 North Elm Street 2000 Renaissance Plaza Greensboro, NC 27401 Telephone: (336) 373-8850 Facsimile: (336) 378-1001 jvanzant@brookspierce.com arodenbough@brookspierce.com rfairchild@brookspierce.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed via the Court's CM/ECF system, which will send electronic notification to all counsel of record.

This the 30th day of July, 2021.

/s/ Beth A. Bryan
Beth A. Bryan